

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JOSEPH GRIMANDO,**

**Plaintiff,**

**vs.**

**No. 21-CV-00108 KWR/KK**

**UNITED STATES OF AMERICA,**

**Defendant.**

**MOTION FOR EXTENSION OF TIME**  
**TO FILE CLOSING DOCUMENTS**

Defendant United States of America moves the Court for a 32-day extension of time for the parties to file the closing documents in this matter or until September 6, 2022. The Court originally ordered the parties to submit closing documents by no later than July 5, 2022, and granted an extension until August 5, 2022. Docs. 29, 31. Due to change in Assistant United States Attorney and in staff, the United States inadvertently failed to submit the claim to the Judgment Fund until the date of this filing. Defendant needs the additional time for the Judgment Fund to process the claim and pay the claim.

The United States sought the position of Plaintiff regarding this motion but did not hear back.

Respectfully submitted,

ALEXANDER M. M. UBALLEZ  
United States Attorney

/s/ Ruth F. Keegan 8/5/22  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2022, I filed the foregoing pleading electronically through the CM/ECF system which caused all parties or counsel of record to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

/s/ Ruth F. Keegan  
RUTH F. KEEGAN  
Assistant United States Attorney